



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

JAN 23 2012

Mr. Michael D. Harris
Environmental Compliance Manager
New Castle County Department of Special Services
187-A Old Churchmans Road
New Castle, Delaware 19720

Re: Pretreatment Program
NPDES No. DE0050547

Dear Mr. Harris:

I am pleased to approve modifications to the legal authority and enforcement response plan of the New Castle County pretreatment program in accordance with the General Pretreatment Regulations (40 C.F.R. 403). Since the modifications did not relax any legal authorities that were not reflected in EPA regulatory revisions, the modification is considered a non-substantial modification and no public notice by EPA is necessary. A listing of the documents included in this approval is enclosed.

The Environmental Protection Agency's General Pretreatment Regulations describe the local pretreatment responsibilities based on the Clean Water Act. The pretreatment program that the County implements must be consistent with these regulations and your approved program.

If this Agency can be of any assistance to you in administering this program, please contact John Lovell at 215-814-5790.

Sincerely,

Evelyn S. MacKnight
David B. McGuigan, PhD

Associate Director
Office of NPDES Permits and Enforcement
Water Protection Division

Enclosure

cc: Rob Underwood, DE DNREC (w/enclosure)



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Customer Service Hotline: 1-800-438-2474*

Documents Included in Pretreatment Program Modification Approval

- New Castle County Ordinance No. 11-032, adopted April 12, 2011.
- New Castle County Non-Domestic Users Enforcement Response Plan, as amended May 19, 2011.





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1650 Arch Street
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Mr. Michael D. Harris
Environmental Compliance Manager
New Castle County Department of Special Services
187-A Old Churchmans Road
New Castle, Delaware 19720

JUL 02 2010

Re: Pretreatment Program
NPDES No. DE0050547

Dear Mr. Harris:

I have completed review of the County's revised draft amendments to its pretreatment ordinance submitted with David Bowie's March 9, 2010 e-mail. Based on my review, the revisions meet the requirements of the General Pretreatment Regulations and are therefore acceptable. As noted in my letter of January 14, 2010 the County implements a significant portion of the pretreatment program of the City of Wilmington. Although a comparison of the County's regulations and the City's ordinance was not made to ensure that the County's regulations include all of the requirements of the City's pretreatment program, the County must ensure that it has sufficient legal authority to implement a program that satisfies the requirements of the City's pretreatment program. It is therefore recommended that the County's regulations be the same as (or very similar to) the City of Wilmington's pretreatment ordinance. Note that the City's proposed revisions to its ordinance included some of the optional streamlining provisions that the County chose not to include in its regulations. If the legal authority is finalized this way, options will be available to users within the City that are not available to users within the County that discharge to the City's treatment plant.

If the County decides to make further changes to its ordinance, please provide a copy of the draft revisions, indicating any changes made from this current version. If no further changes are made, please provide a copy of the signed ordinance after it is adopted. In addition, please provide a copy of the County's finalized enforcement response plan when the signed ordinance is adopted. If you have any questions regarding this matter, please contact me at 215-814-5790.

Sincerely,

A handwritten signature in black ink that reads "John Lovell".

John Lovell
Pretreatment Coordinator
NPDES Permits and Enforcement (3WP41)
Water Protection Division

cc: Rob Underwood, DE DNREC





"Bowie, David"
<DGBowie@nccde.org>
03/09/2010 12:11 PM

To John Lovell/R3/USEPA
cc "Harris, Michael" <MHarris@nccde.org>
bcc
Subject FW: Pretreatment Draft Ordinance NCC

John

Please have a look at this draft version of the ordinance we plan on submitting. Let us know if meets the required changes outlined in your comments regarding the code and the streamlining regs



EPA Streamlining Rules Ordinance 03-10-10 EPA version.doc



"Bowie, David"
<DGBowie@nccde.org>
01/28/2010 12:04 PM

To John Lovell/R3/USEPA JS@EPA
cc
bcc
Subject RE: Some questions from your comment letter

Thanks John

Will have a look at it the BMR stuff and let you know

Just need some "countin" lessons to solve the other issue

-----Original Message-----

From: Lovell.John@epamail.epa.gov [mailto:Lovell.John@epamail.epa.gov]
Sent: Thursday, January 28, 2010 11:59 AM
To: Bowie, David
Cc: MacKnight.Evelyn@epamail.epa.gov; Ottinger.Elizabeth@epamail.epa.gov
Subject: Re: Some questions from your comment letter

If I understand your question on the permit application/BMR, it was just a suggestion and not a requirement. As I read your regs, the 90-day compliance report essentially required a whole new permit application/BMR even if the current permit had not expired (the reference to the permit application/BMR included the entire section as opposed to parts of the section). In our regs, the 90-day compliance report is essentially the first semiannual compliance report (there's a little more to it but not nearly as much as the BMR). You have the ability to require more information in your 90-day compliance report than our regs require, so if you want to leave it as requiring a whole new BMR you can. I just wanted to point it out in case you weren't intending that. If you don't think the current language actually requires that, maybe we can talk about it a little more and make some wording changes to make sure that it is clear. Typically when POTW ordinances reference the BMR requirements for the 90-day compliance report they reference specific sections of the BMR (similar to what our regs do) rather than referencing the entire BMR section. In terms of what I was requiring, the only thing that you absolutely have to do is add something to require BMP compliance information (for any applicable BMPs) in the reports.

As far as the "unapproved amendments", if the only issue was really a typo in the numbering, then all you'd need to do would be to correct that.

Let me know if you'd like to discuss more.

John Lovell
Pretreatment Coordinator
EPA Region 3
1650 Arch Street
Philadelphia, PA 19103-2029
215-814-5790
215-814-2302 (fax)

"Bowie, David"
<DGBowie@nccde.org>

01/28/2010 10:24
AM

To
John Lovell/R3/USEPA/US@EPA
cc
Subject
Some questions from your comment
letter

John

We have reviewed the comments made and are in the process of making the changes and formulating the response. But, in the process we discovered we had a couple questions regarding your comments

2. BMPs

B. Reports include BMP compliance information

We will revise the sections of the code accordingly for the required modification, but still had a question regarding the Note about the BMR/application process. Is this a requirement you are making there or do you just want NCC to rethink the wording and change if we see it as the same issue you have pointed out?

6. Other Provisions

C. Unapproved amendments of the pretreatment regulations

We did find what the matter was, those chapters do not exist and were only present because we had mistyped some numbers. We will provide a clear, correct numbering system when we respond. We always allow for the review of any changes we make, big, small or typo

thanks John

DAVE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Mr. Michael D. Harris
Environmental Compliance Manager
New Castle County Department of Special Services
187-A Old Churchmans Road
New Castle, Delaware 19720

JAN 14 2010

Re: Pretreatment Program
NPDES No. DE0050547

Dear Mr. Harris:

I have completed review of the County's draft revisions to its pretreatment regulations. A copy of the review is enclosed. Based on the review, changes will be needed to the draft before it will be acceptable for approval. Because of the changes in the draft that are needed before it will be considered to be acceptable, I recommend that the County submit a revised draft prior to adoption. This should help ensure that there are no changes that would be required by EPA after adoption. In order to help speed the review of the revised draft, any changes made to the draft should be highlighted.

In addition, please note that the County implements a significant portion of the pretreatment program of the City of Wilmington. Although a comparison of the County's regulations and the City's ordinance was not made to ensure that the County's regulations include all of the requirements of the City's pretreatment program, the County must ensure that it has sufficient legal authority to implement a program that satisfies the requirements of the City's pretreatment program. It is therefore recommended that the County's regulations be the same as (or very similar to) the City of Wilmington's pretreatment ordinance. Note that the City's proposed revisions to its ordinance included some of the optional streamlining provisions that the County chose not to include in its regulations. If the legal authority is finalized this way, options will be available to users within the City that are not available to users within the County that discharge to the City's treatment plant.

Finally, based on the draft revisions submitted, it appears that the County may have made some revisions to its regulations that were not submitted for approval. Section 38.02.704(D) of the proposed revisions of the County's regulations indicates that after addition of a new paragraph 12, this section would now have 15 paragraphs. However, our records indicate that, based on previous versions of the County's regulations that were submitted for approval in the past, this section previously had only 12 paragraphs. This suggests that a previous amendment made to the pretreatment regulations has not been submitted for approval. Our files include a copy of the regulations as amended September 18, 1996 and one amendment which was adopted

on December 21, 2004 (substitute Ordinance No. 1 to Ordinance No. 04-171). If any other amendments have been made to the County's pretreatment regulations, the County will need to submit them for review and approval.

Please provide the revised draft of the regulations when it is available. If you have any questions regarding this matter, please contact me at 215-814-5790.

Sincerely,



John Lovell

Pretreatment Coordinator
NPDES Permits and Enforcement (3WP41)
Water Protection Division

Enclosure

cc: Glenn F. Davis, DE DNREC (w/out enclosure)



Streamlining Revisions Review - New Castle County

On August 31, 2009, the New Castle County Department of Special Services (County) submitted draft modifications of its pretreatment regulations to incorporate changes that are required as a result of EPA's October 14, 2005 revision of the General Pretreatment Regulations (streamlining revisions). This review evaluates the modification submission in regard to the legal authority and discusses the recommended and required changes to the submission that will be necessary prior to formal approval by EPA. Note that comments on the enforcement response plan were previously sent to the County on December 1, 2006. In the discussion below, use of the word "recommended" indicates a change that is recommended although not required, while use of the word "required" or "must" indicates a change that is required. A checklist summarizing the required and recommended changes is attached at the end of this review. The numbers in each section of the discussion refer to the numbers on the checklist. Note that based on this review, the County has chosen not to make revisions authorizing it to establish equivalent mass limits in place of concentration based limits in categorical standards, to establish equivalent concentration limits in place of mass based limits in categorical standards, to establish a category of non-significant categorical industrial users, to establish a category of "middle-tier" categorical industrial users, to relax some of the provisions of the definitions of authorized representative and significant noncompliance (the County did revise the time frame for reporting significant noncompliance), to issue general permits, and to waive monitoring based on pollutants not present. While this is acceptable because the County is not required to make these changes, if the County intended to authorize itself to do any of these things, additional changes to the legal authority will be needed. In addition, please note that the County implements a significant portion of the pretreatment program of the City of Wilmington. Although a comparison of the County's regulations and the City's ordinance was not made to ensure that the County's regulations include all of the requirements of the City's pretreatment program, the County must ensure that it has sufficient legal authority to implement a program that satisfies the requirements of the City's pretreatment program. It is therefore **recommended** that the County's regulations be the same as (or very similar to) the City of Wilmington's pretreatment ordinance. Note that the City's proposed revisions to its ordinance did include some of the optional provisions which the County chose not to include in its regulations. If the legal authority is finalized this way, options will be available to users within the City that are not available to users within the County but that discharge to the City's treatment plant.

Required Streamlining Provisions

Legal Authority

1. Slug Control

C1. Notification of changes affecting slug potential

40 CFR 403.8(f)(2)(vi) requires that industrial users notify the County of any changes at their facilities that affect the potential for a slug discharge. Section 38.02.708 of the regulations requires notification "upon discharging wastes which could exceed the prohibitions in 40 CFR Section 403.5(b) or upon discharging wastes which could potentially harm the POTW." While this provision should be sufficient to require reporting of slug discharges that have occurred, it does not require notification of facility changes that affect the *potential* for slug discharges. ✓

Since the notification of the potential for slug discharges is a requirement of the EPA pretreatment regulations, a specific reporting requirement **must** be added to the regulations requiring that users provide notification of facility changes that affect the potential for a slug discharge.

C2. Incorporation of notification of changes affecting slug potential in IU permits

EPA regulations (40 CFR 403.8(f)(2)(vi)) require that industrial users notify the County of any changes at their facilities that affect the potential for a slug discharge, and require (40 CFR 403.8(f)(1)(iii)(B)(4)) that all user notification requirements are incorporated into the user permits. Section 38.02.704(D)(10) of the regulations allows the County to incorporate requirements in the permits for reporting of significant changes to existing discharges that affect the volume or character of pollutants discharged. While this section authorizes the County to include a condition in the permits that requires notification of changes that actually impact the discharge, it does not specifically allow incorporation of requirements for notification of changes that have a *potential* to impact the discharge. Section 38.02.704(D)(12) allows the County to incorporate other requirements that it determines are necessary, and would therefore allow the County to incorporate the requirement for notification of facility changes that impact the potential for a slug discharge. However, since the incorporation of this notification requirement in the IU permits is a requirement of the EPA pretreatment regulations, it is **recommended** that a specific item be added to Section 38.02.704(D) addressing the County's ability to incorporate the requirement for users to provide notification of facility changes that affect the potential for a slug discharge. One way to do this would be to add a general authorization to allow incorporation of notification requirements. This approach would also specifically allow incorporation of all other notification requirements in the user permits.

D. Incorporation of slug requirements in IU permits

40 CFR 403.8(f)(1)(iii)(B)(6) requires that user permits include requirements to control slug discharges if such requirements are determined to be necessary by the POTW. Section 38.02.704(D)(12) of the County's draft regulations authorizes it to include in the permit other conditions as deemed appropriate to ensure compliance. This is probably sufficient to allow the County to include applicable slug control requirements in user permits, especially since Section 38.02.705(C) requires users to develop slug control plans when required by the General Manager. However, there is no specific authorization in Section 38.02.704(D) to include requirements in the permit for development or implementation of slug control measures. Since the County is required to incorporate slug control requirements in the user permits where needed, it is **recommended** that Section 38.02.704(D) of the regulations be revised to provide specific authorization to include requirements in the permit for development and implementation of slug control measures.

2. Best Management Practices (BMPs)

A. Definition

Section 38.02.701 of the County's regulations defines best management practices. However, the definition indicates that best management practices are "schedules of activities, prohibitions or practices, maintenance procedures, and other management practices to *implement the prohibitions listed in CFE BMP.*" (emphasis added) EPA's definition of best management

practices is similar, but indicates that best management practices include other management practices to implement the general and specific prohibitions. Since the CFE BMP does not appear to include all of the prohibitions, the County's definition **must** be revised. Note that rather than referencing the prohibitions in EPA regulations, the definition should reference the prohibitions in the County's regulations (which include EPA's prohibitions). Language such as "implement the prohibitions of Section 38.02.702 including the requirements and recommended practices listed in the CFE BMP" would address both the prohibitions as well as the County's commercial food establishments BMP.

B. Reports include BMP compliance information

EPA regulations now require that the baseline monitoring report (40 CFR 403.12(b)), the 90-day compliance report (40 CFR 403.12(d)), and the periodic compliance reports (40 CFR 403.12(e) & (h)) include information on compliance with any applicable best management practices. The equivalent sections of the County's regulations, Section 38.02.704(B) (permit application/baseline monitoring report), Section 38.02.704(E)(3) (90-day compliance report), and Section 38.02.704(A)(2) (periodic compliance reports) do not require submission of information on compliance with applicable best management practices and therefore **must** be revised. Note that since Section 38.02.704(E)(3) (90-day compliance report) references Section 38.02.704(B) (baseline monitoring report), revising the baseline monitoring report section of the regulations to require best management practice compliance information would address the requirement in both reports. However, as currently written, the County's regulations require the user to submit a complete new permit application/baseline monitoring report as part of the 90-day compliance report. EPA regulations do not require submission of a new baseline monitoring report as part of the 90-day compliance report, and the County should consider whether this is its intent and revise this provision as appropriate.

3. Significant Noncompliance (SNC)

A. Definition

Section 38.02.701 of the County's draft regulations has been revised to incorporate EPA's new definition of significant noncompliance. However, a few of the words in Parts (A) and (B) of the definition appear to have been omitted. In addition, EPA regulations define pretreatment standard at 40 CFR 403.3(l) and pretreatment requirement at 40 CFR 403.3(t). If the County cites EPA's definitions in part (C) of its significant noncompliance definition, a citation to both terms would need to be included. However, since both terms are included in the County's regulations, it is **recommended** that the definition reference the County's definitions. A copy of pages 2 and 3 of the draft regulations is enclosed showing the missing wording.

4. Sampling

A. Grab/composite sampling requirements apply to all users

40 CFR 403.12(g)(3) requires that sampling be conducted using flow proportional composite sampling except where another type of sampling is authorized by the Control Authority, requires that grab sampling be conducted for six specific pollutants or pollutant groups, and specifies when grab samples may be composited. No equivalent provision was found in the County's regulations, and therefore they **must** be revised.

6. Other Provisions

B. Notification of changed discharge

40 CFR 403.12(j) requires all industrial users to notify the County of any substantial changes in their discharge. While Section 38.02.704(D)(10) authorizes the County to include a condition in the user permits to require this notification, not all industrial users are required to obtain permits. Therefore the County's regulations **must** be revised to require this notification from all industrial users. ✓

C. Unapproved amendments of the pretreatment regulations

Section 38.02.704(D) of the proposed revisions of the County's regulations indicates that after addition of a new paragraph 12, this section now has 15 paragraphs. However, based on previous versions of the County's regulations submitted for approval in the past, our records indicate that this section previously had only 12 paragraphs. This suggests that an amendment made to the pretreatment regulations in the past has not been submitted for approval. Our files include a copy of the regulations as amended September 18, 1996 and one amendment which was adopted on December 21, 2004 and approved on December 29, 2004 (substitute Ordinance No. 1 to Ordinance No. 04-171). If any other amendments have been made to the County's pretreatment regulations, the County **must** submit them for review and approval. OK

Typographical errors

A few typographical errors or recommendations for minor wording changes were found on pages 2 and 3 of the draft regulations. Copies of these pages of the draft regulations are attached showing the recommended corrections. ✓

Required Streamlining Revisions Review Checklist - New Castle County (Legal Authority and ERP)

Required Streamlining Provision	Revision			Comments
	None	Rec	Req	
1. Slug control				
A. Definition of slug load	X			38.02.701
B. Legal authority authorizes POTW to conduct inspections of entire facility?	X			35.02.706
C. Require SIUs to notify of changes affecting potential for slug discharges:				
▶ Legal authority specifically requires notification?			X	None
▶ Legal authority specifically allows incorporation of notification in permits?		X		38.02.704(D)(13)
D. Legal authority specifically allows incorporation of slug requirements in IU permits?		X		38.02.704(D)(13)
2. BMPs				
A. Definition			X	38.02.701
B. Legal authority requires BMP compliance information in BMR, 90-day report, and self-monitoring reports?			X	38.02.704(B) 38.02.704(E)(3) 38.02.704(A)(2)
C. Legal authority specifically allows incorporation of BMP requirements in IU permits?	X			38.02.704(D)(12)
D. Legal authority requires POTW and IU to maintain records on BMP requirements?	X			38.02.703(G)
3. Expand SNC definition for violations of pretreatment standards and requirements:				
A. Legal authority definition needs to be revised?		X		38.02.701
4. Sampling				
A. Legal authority applies grab/composite sampling requirements to all SIUs (and NSCIUs)?			X	None
B. Repeat sampling authorized if POTW conducts all of the monitoring itself?	X			N/A

Required Streamlining Provision	Revision			Comments
	None	Rec	Req	
C. Legal authority requires sampling at all SIUs (and NSCIUs) to be representative?	X			38.02.706(D)
5. Reporting				
A. Legal authority requires all SIUs (and NSCIUs) to report all sample results?	X			38.02.704(E)(4)
6. Other provisions				
A. Special agreements				
▶ specifically prohibit changes to both categorical standards and other federal pretreatment requirements (e.g., reporting)?	X			38.02.703(B) 38.02.704(H)
▶ establish a cap based on the current MAIL for revised local limits?	X			38.02.703(B) 38.02.704(H)
▶ require that the revised limit or requirement be granted in writing?	X			38.02.703(B) 38.02.704(H)
B. Notification of changed discharge			X	38.02.704(D)(10)
C. Unapproved amendments of the pretreatment regulations			X	

Special Services policy. For permits issued after March 31 of any year, the fee shall be prorated to account ~~ten dollars (\$10.00)~~ for each month or part of a month remaining in the calendar year. There shall be no refund for suspended or canceled permits.

2. *User fees.* User fees shall be assessed for each truckload of sanitary waste discharged at the depository on the basis of the County's contractual flow rate, average strength rates (BOD and SS) and the cost of operating and monitoring the depository as set by the Department of Special Services. ... The County shall bill each permitted sanitary waste hauler on a quarterly basis for each truckload discharged at the depository in that period. schedule set by the Department of Special Services. All billings shall be paid in full within thirty (30) days of receipt or access to the depository will be denied. All billings shall be considered received on the third business days after the date of County's mailing.

3. *Special Approval Fees.* ...

Section 2. *New Castle County Code* Chapter 38 ("Utilities"), Article 2 ("Sewers and Sewage Disposal"), Section 38.02.701 ("Definitions") is hereby amended by deleting the material in strikethroughs and adding the material that is underscored, as set forth below:

Sec. 38.02.701. Definitions.

...

Best Management Practices ("BMP") Manual means ~~the BMP requirements and recommended practices maintained by the Department of Special Services and issued to all commercial food establishments.~~ schedules of activities, prohibitions or practices, maintenance procedures, and other management practices to implement the prohibitions listed in CFE BMP. BMP's also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage.

...

Commercial Food Establishments ("CFE") BMP Manual means the best management practice requirements and recommended practices maintained by the Department of Special Services and issued to all commercial food establishments.

...

Significant noncompliance means any one (1) ^{or more} of the following:

- A. Chronic violations of wastewater discharge limits in which sixty-six (66) percent or more of all the measurements taken for the same pollutant parameter during a six (6) month period exceed ~~the~~ (by any

magnitude) a numeric pretreatment standard or requirement, including instantaneous permit limit for the same pollutant parameter.

- B. Technical Review Criteria (TRC) violations ^{taken} in which thirty-three (33) percent or more of all of the measurements for a the same pollutant parameter taken during a six (6) month period equal or exceed the product of the numeric pretreatment standard or requirement including instantaneous permit limits, as defined by 40 CFR 403.3(l) multiplied by the applicable TRC criteria (TRC=one and four-tenths (1.4) for BOD, TSS, fats, oils and grease, and one and two-tenths (1.2) for all other pollutants except pH.)
- C. Any other violation of a pretreatment standard or requirement as defined by 40 CFR 403.3(l) (daily maximum, long-term average, instantaneous effluent limit, or narrative standard) that the county determines has caused, alone or in combination with other discharges, interference or pass through, including endangering the health of POTW personnel or the general public.
- D. Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the ~~POTW's~~ County's exercise of its emergency authority to halt or prevent such a discharge.
- E. Failure to meet, within ninety (90) days of the scheduled date, a compliance schedule milestone contained in the wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance.
- F. Failure to provide within ~~thirty (30)~~ forty-five (45) days after the due date, any required reports such as baseline monitoring reports, ninety (90) day compliance reports, compliance with categorical Pretreatment Standard deadlines, periodic self-monitoring reports, and reports on compliance schedules.
- G. Failure to accurately report noncompliance.
- H. Any other violation or group of violations, which may include a violation of Best Management Practices, which the County determines will adversely affect the operation or implementation of the local pretreatment program.
- ...

Section 3. *New Castle County Code* Chapter 38 ("Utilities"), Article 2 ("Sewers and Sewage Disposal"), Section 38.02.703 ("Maximum constituents") is hereby amended by deleting the material in strikethroughs and adding the material that is underscored, as set forth below:



DEPARTMENT OF SPECIAL SERVICES

August 31, 2009

Mr. John Lovell
Pretreatment Coordinator
Office of NPDES Permits and Enforcement
Water Protection Division
United States Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029



**RE: Pretreatment Program
NPDES No. DE0050547**

Dear Mr. Lovell:

For your review, please find attached the draft ordinance that will amend New Castle County's regulations for non-domestic users. The draft ordinance amends Chapter 38 of the New Castle County Code ("Code") to better conform to EPA's streamlining regulations and model ordinance.

If you have any questions regarding this matter, please contact me at 302-395-5806.

Sincerely,

Michael D. Harris

Michael D. Harris
Environmental Compliance Manager

Cc: M. Neutz – City of Wilmington
D. Cole

